

UNDER SEAL

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CASE NO. 3:08-cr-34-C

FILED  
CHARLOTTE, N.C.  
FEB 26 2008  
U.S. DISTRICT COURT  
W. DIST. OF N.C.

UNITED STATES OF AMERICA,	)	BILL OF INDICTMENT
	)	
	)	Violations:
	)	
Plaintiff,	)	8 U.S.C. § 1324(a)(1)(A)(ii)
	)	18 U.S.C. § 1591
v.	)	18 U.S.C. § 2421
	)	18 U.S.C. § 2423
	)	18 U.S.C. § 2
	)	
	)	
JORGE FLORES-ROJAS,	)	
	)	
Defendant.	)	

THE GRAND JURY CHARGES THAT:

COUNT ONE

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

**JORGE FLORES-ROJAS**

aiding and abetting others known and unknown to the Grand Jury and knowingly, and in or affecting interstate or foreign commerce, recruited, enticed, harbored, transported, provided and obtained by any means; or benefitted financially, or by receiving anything of value, from participation in a venture, "F.C.," a minor under the age of 18 years, knowing that "F.C." had not attained the age of 18 years and that "F.C." would be caused to engage in a commercial sex act,

and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

In violation of Title 18, United States Code Sections 1591 and 2.

**COUNT TWO**

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

**JORGE FLORES-ROJAS**

aiding and abetting others known and unknown to the Grand Jury, knowingly transported an individual, that is, "C.C.," in interstate or foreign commerce, from the Western District of North Carolina to Washington, D.C., with the intent that "C.C." engage in prostitution, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

In violation of Title 18, United States Code Sections 2421 and 2.

**COUNT THREE**

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

**JORGE FLORES-ROJAS**

aiding and abetting others known and unknown to the Grand Jury, knowingly transported an individual, that is, "F.C.," who had not attained the age of 18 years, in interstate or foreign commerce, from the Western District of North Carolina to Washington, D.C., with the intent that "F.C." engage in prostitution, and they aided, abetted, counseled, commanded, induced or

procured the commission of this offense.

In violation of Title 18, United States Code Sections 2423 and 2.

**COUNT FOUR**

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

**JORGE FLORES-ROJAS**

aiding and abetting others known and unknown to the Grand Jury, knowing or in reckless disregard of the fact that "F.C." has come to, entered, or remained in the United States in violation of law, transported or moved such alien within the United States by means of transportation or otherwise, in furtherance of such violation, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.

In violation of Title 8, United States Code Sections 1324 (a)(1)(A)(ii) and 2.

**COUNT FIVE**

In or around November 2007 through in or around December 2007, in Mecklenburg County, within the Western District of North Carolina and elsewhere,

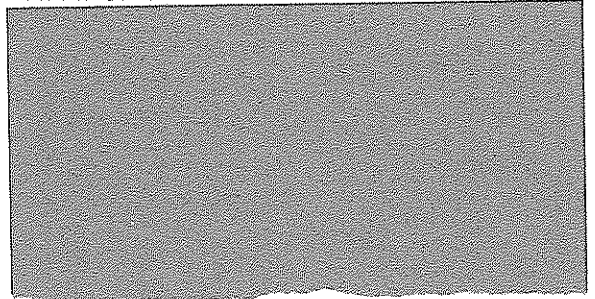
**JORGE FLORES-ROJAS**

aiding and abetting others known and unknown to the Grand Jury, knowing or in reckless disregard of the fact that "C.C." has come to, entered, or remained in the United States in violation of law, transported or moved such alien within the United States by means of

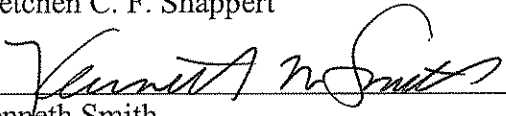
transportation or otherwise, in furtherance of such violation of law, and they aided, abetted, counseled, commanded, induced or procured the commission of this offense.


In violation of Title 8, United States Code Sections 1324 (a)(1)(A)(ii) and 2.

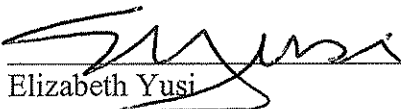
A TRUE BILL



UNITED STATES ATTORNEY  
WESTERN DISTRICT OF NORTH CAROLINA  
Gretchen C. F. Shappert

  
\_\_\_\_\_  
Kenneth Smith  
Assistant United States Attorney  
Western District of North Carolina

  
\_\_\_\_\_  
Kayla Bakshi  
Trial Attorney, Civil Rights Division, Criminal Section  
United States Department of Justice

  
\_\_\_\_\_  
Elizabeth Yusi  
Trial Attorney, Criminal Division, Child Exploitation and Obscenity Section  
United States Department of Justice